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Attorneys for Defendants

## UNITED STATES DISTRICT COURT

## DISTRICT OF OREGON

## PORTLAND DIVISION

OREGON NATURAL DESERT ASS'N, AUDUBON SOCIETY OF PORTLAND, and DEFENDERS OF WILDLIFE,

Case No. 3:19-cv-01550

Plaintiffs,

v.

UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFFS' AMENDED COMPLAINT

THERESA HANLEY, Acting State Director, BLM Oregon/Washington, and BUREAU OF LAND MANAGEMENT,

Defendants **CAHILL RANCHES, Inc.,** 

Intervenor-Defendant.

Federal Defendants move to extend the deadline for responding to Plaintiffs' Amended Complaint to January 15, 2019. In support of this motion Defendants state as follows:

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- 1. On December 13, Plaintiffs filed an Amended Complaint. ECF No. 15.
- 2. Under Rule 15(a)(3) of the Federal Rules of Civil Procedure, responses to the Amended Complaint are due December 27.
- 3. Previously scheduled leave during the holidays will prevent counsel and staff for the Defendants and Intervenor-Defendant from responding to the Amended Complaint by the current deadline.
- 4. Defendants therefore seek an extension of 19 days, until January 15, 2020, to respond to Plaintiffs' Amended Complaint.
- 5. Counsel for Federal Defendants has conferred with counsel for Plaintiffs and counsel for Defendant-Intervenor and is advised that Plaintiffs do not oppose this motion and that Defendant-Intervenor supports this motion.

For the foregoing reasons Defendants ask that the deadline to respond to the Plaintiffs' Amended Complaint be extended to January 15, 2020.

Dated this 23rd day of December, 2019.

Respectfully submitted,

JEAN E. WILLIAMS Deputy Assistant Attorney General

/s/Barclay T. Samford
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